

**FILED**  
**NOV 18 2021**  
U.S. DISTRICT COURT-WVND  
MARTINSBURG, WV 25401

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA**

**UNITED STATES OF AMERICA,**

**v.**

**TODD DWAYNE MILLS, JR.,**

**Defendant.**

**Criminal No.**

**3:21-CR- 50**

**Violations:**

**18 U.S.C. § 922(a)(6)**

**18 U.S.C. § 924(a)(2)**

**INFORMATION**

The United States Attorney charges that:

**COUNT ONE**

(False Statement During Purchase of Firearms)

On or about March 2, 2021, in Berkeley County, in the Northern District of West Virginia, defendant **TODD DWAYNE MILLS, JR.**, in connection with the acquisition of firearms, a Springfield (HS Produkt) XD9 Sub-Compact, 9mm caliber pistol, bearing serial number BY560075 and a Taurus Model G2C pistol, 9mm caliber, bearing serial number TLS25889, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **TODD DWAYNE MILLS, JR.** under chapter 44 of Title 18, in that the defendant represented he was the actual purchaser of the firearms, when in fact, he was not the true purchaser of the firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**FORFEITURE ALLEGATION**

*Gun Control Act*

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1), the government will seek the forfeiture of any firearm and any ammunition involved in or used in any knowing violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2), including a Springfield (HS Produkt) XD9 Sub-Compact, 9mm caliber pistol, bearing serial number BY560075, a Taurus Model G2C pistol, 9mm caliber, bearing serial number TLS25889, and ammunition.

  
WILLIAM J. IHLENFELD  
United States Attorney